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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA AT ANCHORAGE

KEITH C. JOHNSON,

Plaintiff,

v.

RLI INSURANCE COMPANY,

Defendant.

Case No. 3:14-cv-_____ - ____

NOTICE OF REMOVAL

Defendant RLI Insurance Company (“RLI”) gives notice of the removal of the above-captioned action, currently pending in the Superior Court for the State of Alaska, Third Judicial District at Anchorage, under Case No. 3AN-14-6526 CI, to the United States District Court for the District of Alaska. Removal is based on diversity of citizenship under 28 U.S.C. §§ 1332 and 1441.

As grounds for removal, RLI states as follows:

1. On April 29, 2014, Plaintiff Keith C. Johnson (“Johnson”) filed his Complaint for Declaratory Relief and Damages (the “Complaint”) with the Clerk of the Superior Court for the State of Alaska in the Third Judicial District at Anchorage. [Compl. attached as Ex. A.] Johnson purports to bring the Complaint as the assignee of certain claims of the Estate of Robert Stenehjem, Sr. (“the Estate”), which allegedly stem from RLI’s denial of insurance coverage to the Estate. [Compl. ¶¶ 19-20.]

2. Johnson purports to have served the Complaint on RLI on April 30, 2014. [*See* Affidavit of Proof of Service Pursuant to Civil Rule 4(f) attached as Ex. B.]

3. Johnson purports to be a resident of Hinckley, Minnesota. [Compl. ¶ 1.]

4. RLI is organized under the laws of the State of Illinois and maintains its principal place of business in the State of Illinois. [Compl. ¶ 2.]

5. Johnson claims damages in excess of \$100,000. [Compl. Prayer for Relief ¶¶ 2-3.]

6. Because there is complete diversity of citizenship among the parties and because the amount in controversy exceeds the jurisdictional minimum, this Court has jurisdiction over this action pursuant to 28 U.S.C. § 1332. Accordingly, this action is removable to this Court pursuant to 28 U.S.C. § 1441.

7. This Notice of Removal is timely under 28 U.S.C. § 1441(d), and will be served upon Johnson's counsel and filed promptly in the state court.

DATED this 20th day of May, 2014.

LANE POWELL LLC
Attorneys for Defendant

By s/ Brewster H. Jamieson
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Michael B. Baylous, ABA No. 0905022

I certify that on May 20, 2014, a copy of the foregoing was served by U.S. mail and email, on:

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s/ Brewster H. Jamieson

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